

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

<b>TQ DELTA, LLC,</b>	§	
<b>Plaintiff,</b>	§	
	§	<b>JURY TRIAL DEMANDED</b>
<b>v.</b>	§	
	§	
<b>COMMSCOPE HOLDING COMPANY,</b>	§	
<b>INC., COMMSCOPE INC., ARRIS</b>	§	
<b>INTERNATIONAL LIMITED, ARRIS</b>	§	
<b>GLOBAL LTD., ARRIS US HOLDINGS,</b>	§	<b>Civil Action 2:21-cv-310-JRG</b>
<b>INC., ARRIS SOLUTIONS, INC., ARRIS</b>	§	<b>(Lead Case)</b>
<b>TECHNOLOGY, INC., and ARRIS</b>	§	
<b>ENTERPRISES, LLC,</b>	§	
	§	
<b>NOKIA CORP., NOKIA SOLUTIONS</b>	§	
<b>AND NETWORKS OY, and NOKIA OF</b>	§	<b>Civil Action No. 2:21-cv-309-JRG</b>
<b>AMERICA CORP.</b>	§	<b>(Member Case)</b>
	§	
<b>Defendants.</b>	§	

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**TQ DELTA, LLC’S UNOPPOSED MOTION TO FILE UNDER SEAL**

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Pursuant to Local Rule CV-5(a)(7), Plaintiff TQ Delta, LLC (“TQ Delta”) submits this Unopposed Motion to File Under Seal its Response to Defendant Nokia of America Corporation’s Motion to Dismiss Under Rule 12(b)(6) for Failure to Plead Compliance with the Actual Notice and Marking Requirements of 35 U.S.C. § 287(a) and exhibits (“Response”). A protective order has not been entered in this matter. Pursuant to the Court’s Order Setting Scheduling Conference, the parties’ deadline to submit a protective order in this matter is currently December 9, 2021 (Dkt. 27). TQ Delta’s Response contains information the parties will designate as “Confidential” or “Highly Confidential” when a protective order is in place.

Counsel for TQ Delta has meet-and-conferred with Nokia, and Nokia does not oppose the relief sought by this motion.

TQ Delta respectfully requests the Court enter an order sealing its Response to Defendant Nokia of America Corporation's Motion to Dismiss Under Rule 12(b)(6) for Failure to Plead Compliance with the Actual Notice and Marking Requirements of 35 U.S.C. § 287(a) and exhibits.

Dated: November 12, 2021

Respectfully submitted,

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ATTORNEYS FOR PLAINTIFF  
TQ DELTA, LLC

**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document is being filed electronically in compliance with Local Rule CV-5(a). As such, this document is being served this November 12, 2021, on all counsel of record, each of whom is deemed to have consented to electronic service. L.R. CV-5(a)(3)(A).

/s/ Christian Hurt  
Christian Hurt

**CERTIFICATE OF CONFERENCE**

The undersigned certifies that counsel have complied with the meet-and-confer requirements of Local Rule CV-7(h) and (i) and that Defendant Nokia of America Corporation is unopposed to this motion.

/s/ Christian Hurt  
Christian Hurt